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 6 Attorneys for all Defendants except Prasad Lakireddy

7
 8 IN THE UNITED STATES DISTRICT
 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 JANE DOE I; JANE DOE II; LAKSHMI
 11 and JARMANTI PRATTIPATI as Parents
 12 and Successors in Interest of CHANTI
 13 JYOTSNA DEVI PRATTIPATTI; JANE
 14 DOE III; JANE DOE IV; JANE DOE V;
 DANE DOE VI; JANE DOE VII; JANE
 DOE VIII; SREEKANTH KOLLIPARA;
 and All Others Similarly Situated

15 Plaintiffs,

16 vs.

17 LAKIREDDY BALI REDDY, an
 individual; VIJAY KUMAR
 18 LAKIREDDY, an individual; PRASAD
 LAKIREDDY, an individual;
 19 JAYAPRAKASH REDDY LAKIREDDY,
 an individual; VENKATESWARA
 REDDY LAKIREDDY, an individual; and
 the businesses they controlled and/or
 20 operated, including PASAND MADRAS
 CUISINE, a California corporation;
 21 PASAND, INC., a California corporation;
 LAKIREDDY INVESTMENT CO., a
 22 California limited liability corporation; L.B.
 REDDY ESTATE CO., a California limited
 23 liability company; JAY CONSTRUCTION,
 a California sole proprietorship; ACTIVE
 24 TECH SOLUTIONS, a California
 corporation; VANI COMPUTER
 25 SOLUTIONS, a California limited liability
 corporation; LAKIREDDY BALI REDDY
 26 d/b/a REDDY REALTY CO., a California
 sole proprietorship; and ROES 1 through
 27 100, inclusive,

28 Defendants.

Case No. C-02-5570-WHA

**RESPONSES TO PLAINTIFF LAKSHMI
 PRATTIPATI'S FIRST SET OF
 INTERROGATORIES TO DEFENDANT
 JAY CONSTRUCTION**

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1 PROPOUNDING PARTY: PLAINTIFF LAKSHMI PRATTIPATI

2 RESPONDING PARTY: JAY CONSTRUCTION

3 SET NUMBER: ONE

4
5 1. Please state all factual or legal defenses to the allegations in PLAINTIFFS' Second
6 Amended Complaint that YOU intend to assert at the trial of this matter.

7 **RESPONSE:** Objection, this interrogatory seeks information protected by the Attorney/Client,
8 Work Product and Joint Defense Privileges. Furthermore, this interrogatory is premature as
9 defendants are still developing which factual and/ or legal defenses which they intend to assert at
10 trial. Subject to and without waving said objections, responding party answers as follows:
11 Defendants may present any and all factual and/or legal defenses identified in Defendants Answer
12 to PLAINTIFFS' Second Amended Complaint and reserve the right to assert any and all
13 additional defenses stated therein. Defendants do not know which of PLAINTIFFS' claims, if
14 any, will survive to the time of trial and we reserve the right to seek summary judgment and/or
15 adjudication on any and all claims, including but not limited to PLAINTIFFS' RICO claims
16 under 18 U.S.C. §1962(c) and (d), PLAINTIFFS' claims under the Anti-Peonage Act (42 U.S.C.
17 §1994), PLAINTIFFS' claims of Peonage, Involuntary Servitude and Forced Labor, and any
18 claims made pursuant to the Alien Tort Claims Act.

19 2. For every defense identified in response to Interrogatory No. 1, please state all facts that
20 support or otherwise RELATE TO that defense.

21 **RESPONSE:** Objection, this interrogatory seeks information protected by the Attorney/Client,
22 Work Product and Joint Defense Privileges and is vague and ambiguous, overbroad and
23 oppressive with regard to the terms "RELATE TO". Subject to and without waving said
24 objections, responding party answers as follows: Defendants refer PLAINTIFFS to defendants
25 Answer to PLAINTIFFS' Second Amended Complaint and reserve the right to present any and
26 all facts, whether now known or in the future discovered, in support of every defense factually or
27 legally available to defendants. We may also call all individuals identified in our Rule 26
28

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1 Disclosures to testify concerning their treatment by defendants. Defendants also may call Does
2 III, IV, V and VI to describe their working conditions and treatment by the defendants.
3 Defendants may call former employees who have been deposed to describe their working
4 conditions and treatment by defendants. Defendants will offer expert testimony as described in
5 our FRCP 26(a)(2)(A) Disclosures. Defendants will testify on their own behalf concerning the
6 admissions and denials contained in their answer.

7
8 3. Please state every affirmative defense YOU intend to assert in response to PLAINTIFFS'
9 Second Amended Complaint.

10 **RESPONSE:** Objection, vague, ambiguous and unintelligible. The information requested is
11 equally available to the requesting party. Counsel should refer to our answer to PLAINTIFFS'
12 Second Amended Complaint to see what affirmative defenses have been asserted in response
13 thereto.

14
15 4. Do YOU contend that any PLAINTIFF is responsible for any of the damages asserted in
16 the Second Amended Complaint?

17 **RESPONSE:** Objection, this interrogatory seeks information protected by the Attorney/Client,
18 Work Product and Joint Defense Privileges, is compound, conjunctive and disjunctive, and vague
19 and ambiguous as to terms "responsible for". Subject to and without waiving said objections,
20 responding party answers as follows: Yes.

21
22 5. If your answer to Interrogatory No. 4 is yes, please state all facts YOU rely upon to
23 support YOUR contentions.

24
25 **RESPONSE:** Defendants refer PLAINTIFFS to defendants' Answer to PLAINTIFFS' Second
26 Amended Complaint. Some or all PLAINTIFFS conspired to enter the United States illegally.
27 Some of all PLAINTIFFS failed to mitigate their physical, psychological and/or economic
28 damages.

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6. Do YOU contend that the claims of or damages asserted by any PLAINTIFF are barred by the doctrine of unclean hands?

RESPONSE: Objection, this interrogatory seeks information protected by the Attorney/Client, Work Product and Joint Defense Privileges. Subject to and without waiving said objections, responding party answers as follows: Yes.

7. If YOUR answer to Interrogatory No. 6 is yes, please state all facts YOU rely upon to support YOUR contentions.

RESPONSE: PLAINTIFFS and potential class members knowingly and willingly agreed and conspired to enter the country under false visas, to be paid "off the books" and to receive free rent and free food in order to avoid paying taxes. PLAINTIFFS, potential class members, and in particular DOE VIII, may have committed Federal and/or State crimes, including but not limited to immigration fraud, tax fraud, welfare fraud, and child molestation. The basis of these contentions are set forth in our Motion to Dismiss PLAINTIFFS' First Amended Complaint.

8. Do YOU contend that the claims of or damages asserted by any PLAINTIFF are barred by the doctrine of *in pari delicto*?

RESPONSE: Objection, this interrogatory seeks information protected by the Attorney/Client, Work Product and Joint Defense Privileges. Subject to and without waiving said objections, responding party answers as follows: Yes.

9. If YOUR answer to Interrogatory No. 8 is yes, please state all facts YOU rely upon to support YOUR contentions.

RESPONSE: PLAINTIFFS and potential class members knowingly and willingly agreed and conspired to enter the country under false visas, to be paid "off the books" and to receive free rent and free food in order to avoid paying taxes. PLAINTIFFS, potential class members, and in particular DOE VIII, may have committed Federal and/or State crimes, including but not limited to immigration fraud, tax fraud, welfare fraud, and child molestation. The basis of these contentions are set forth in our Motion to Dismiss PLAINTIFFS' First Amended Complaint.

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10. Do YOU contend that Jane Does I, II, III, V, VI and Chanti Prattipatti were NOT all under 18 years of age when they first arrived in the United States?

RESPONSE: Objection, this interrogatory seeks information protected by the Attorney/Client, Work Product and Joint Defense Privileges, is compound, conjunctive and disjunctive, and vague and ambiguous, seeks expert opinion and/or legal conclusion. Subject to and without waiving said objections, responding party answers as follows: Defendants do not know PLAINTIFFS actual ages.

11. If YOUR answer to Interrogatory No. 11 is yes, please state all facts YOU rely upon to support YOUR contentions about PLAINTIFFS' and decedent's ages.

RESPONSE: Objection, this interrogatory seeks information protected by the Attorney/Client, Work Product and Joint Defense Privileges, is compound, conjunctive and disjunctive, vague and ambiguous and calls for expert opinion and/or legal conclusion. Subject to and without waiving said objections, responding party answers as follows: N/A.

12. Do YOU contend that any parent of Jane Does I, II, III, V, VI and/or Chanti Prattipatti knew, prior to L.B. Reddy's arrest in January 2000, that L.B. Reddy was having sexual relations with his or her daughter?

RESPONSE: Objection, this interrogatory seeks information protected by the Attorney/Client, Work Product and Joint Defense Privileges, is compound, conjunctive and disjunctive, and vague and ambiguous, seeks expert opinion and/or legal conclusion. Subject to and without waiving said objections, responding party answers as follows: Yes. DOES I, III, V and VI. As far as DOE II and Chanti Prattipatti are concerned, defendants do not know at this time.

13. If YOUR answer to Interrogatory No. 13 is yes, please state all facts YOU rely upon to support YOUR contentions.

RESPONSE: Objection, this interrogatory seeks information protected by the Attorney/Client, Work Product and Joint Defense Privileges, is compound, conjunctive and disjunctive, vague and

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1 ambiguous and calls for expert opinion and/or legal conclusion. Subject to and without waiving
2 said objections, responding party answers as follows: As far as DOES I, III, V and VI; their
3 relationship was open and mutual. See depositions of all DOE plaintiffs. As far as DOE II and
4 Chanti Prattipati are concerned, this matter is still under investigation.

5
6 14. Do YOU contend that any PLAINTIFF engaged in SEXUAL RELATIONS in exchange
7 for money in the United States?

8 **RESPONSE:** Objection, this interrogatory seeks information protected by the Attorney/Client,
9 Work Product and Joint Defense Privileges, is compound, conjunctive and disjunctive, and vague,
10 ambiguous. Subject to and without waiving said objections, responding party answers as follows:
11 Defendants have not formed an opinion with respect to this contention at this time.

12
13 15. If your answer to Interrogatory No. 14 is yes, state all facts you rely upon to support you
14 contentions about PLAINTIFFS' sexual relations in exchange for money.

15 **RESPONSE:** N/A.

16
17 16. Do you contend that any PLAINTIFF required, asked or forced anyone to engage in
18 SEXUAL RELATIONS in exchange for money in the United States?

19 **RESPONSE:** Objection, this interrogatory seeks information protected by the Attorney/Client,
20 Work Product and Joint Defense Privileges, is compound, conjunctive and disjunctive, vague and
21 ambiguous and calls for expert opinion and/or legal conclusion. Subject to and without waiving
22 said objections, responding party answers as follows: Defendants have not formed an opinion
23 with respect to this contention at this time.

24 17. If your answer to Interrogatory No. 16 is yes, state all facts you rely upon to support you
25 contentions about PLAINTIFFS' asking, requiring or forcing anyone to engage in sexual relations
26 in exchange for money.

27 **RESPONSE:** N/A.
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1 18. Do you contend that any PLAINTIFF has ever made any false accusation of rape?

2 **RESPONSE:** Objection, this interrogatory seeks information protected by the Attorney/Client,
3 Work Product and Joint Defense Privileges, is compound, conjunctive and disjunctive, vague and
4 ambiguous and calls for expert opinion and/or legal conclusion. Subject to and without waiving
5 said objections, responding party answers as follows: Yes.

6
7 19. If your answer to Interrogatory No. 18 is yes, state all facts you rely upon to support you
8 contentions about any PLAINTIFF making any false accusation of rape.

9 **RESPONSE:** With respect to DOES I, II, III, IV, V, and VI, see Answers to Interrogatories,
10 Petitions for Political Asylum, depositions of DOES I, II, III, IV, V and VI, depositions of L.B
11 Lakireddy, Jayaprakash Lakireddy, Vijay Lakireddy and Venkateswara Lakireddy.

12
13 20. Please state all facts RELATED TO any occasion upon which any PLAINTIFF was
14 required to engage in SEXUAL RELATIONS in the United States in exchange for money or
15 other compensation.

16 **RESPONSE:** Objection, this interrogatory seeks information protected by the Attorney/Client,
17 Work Product and Joint Defense Privileges, is compound, conjunctive and disjunctive, vague and
18 ambiguous, overbroad and oppressive as to terms "RELATED TO", assumes facts not in
19 evidence, and calls for expert opinion and/or legal conclusion. Subject to and without waiving
20 said objections, responding party answers as follows: Defendants are not in possession of any
21 facts responsive to this interrogatory at this time.

22
23 21. Please state all facts RELATED TO any occasion upon which any PLAINTIFF was asked
24 to engage in SEXUAL RELATIONS in the United States in exchange for money or other
25 compensation.

26
27 **RESPONSE:** Objection, this interrogatory seeks information protected by the Attorney/Client,
28 Work Product and Joint Defense Privileges, is compound, conjunctive and disjunctive, vague and

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1 ambiguous, overbroad and oppressive as to terms "RELATED TO", assumes facts not in
2 evidence, and calls for expert opinion and/or legal conclusion. Subject to and without waiving
3 said objections, responding party answers as follows: Defendants are not in possession of any
4 facts responsive to this interrogatory at this time.

6 22. Please state all facts RELATED TO any occasion upon which any PLAINTIFF was paid
7 for having SEXUAL RELATIONS with anyone in the United States.

8 **RESPONSE:** Objection, this interrogatory seeks information protected by the Attorney/Client,
9 Work Product and Joint Defense Privileges, is compound, conjunctive and disjunctive, vague and
10 ambiguous, overbroad and oppressive as to terms "RELATED TO", assumes facts not in
11 evidence, and calls for expert opinion and/or legal conclusion. Subject to and without waiving
12 said objections, responding party answers as follows: Defendants are not in possession of any
13 facts responsive to this interrogatory at this time.

15 23. Please state all facts RELATED TO any occasion upon which any DEFENDANT
16 received money or other compensation in exchange for any PLAINTIFF having SEXUAL
17 RELATIONS with anyone in the United States.

18 **RESPONSE:** Objection, this interrogatory seeks information protected by the Attorney/Client,
19 Work Product and Joint Defense Privileges, is compound, conjunctive and disjunctive, vague and
20 ambiguous, overbroad and oppressive as to terms "RELATED TO", assumes facts not in
21 evidence, and calls for expert opinion and/or legal conclusion. Subject to and without waiving
22 said objections, responding party answers as follows: Defendants are not in possession of any
23 facts responsive to this interrogatory at this time.

25 24. Please describe all efforts YOU have made since 1996 to comply with the immigration
26 laws of the United States as they relate to any business(es) you own or operate.

27 **RESPONSE:** Objection, this interrogatory seeks information protected by the Attorney/Client,
28 Work Product and Joint Defense Privileges, is compound, conjunctive and disjunctive, vague and

1 ambiguous, overbroad and oppressive as to terms "all efforts" and "the immigration laws of the
2 United States", and calls for expert opinion and/or legal conclusion.

3
4 25. Please IDENTIFY all persons, including attorneys and investigators, who have visited
5 India and spoken with residents of Velvedam on YOUR behalf since January of 2000.

6 **RESPONSE:** Objection, this interrogatory seeks information protected by the Attorney/Client,
7 Work Product and Joint Defense Privileges.

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9 Dated: November 21, 2003

BISHOP, BARRY, HOWE, HANEY & RYDER

10
11 By: 

12 MICHAEL W BOLECHOWSKI
13 MARK C. RASKOFF
14 DENNIS A. PHILLIPS
15 DAVID L. HART
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VERIFICATION

RESPONSES TO LAKSHMI PRATTIPATI'S FIRST SET OF INTERROGATORIES TO DEFENDANT JAY CONSTRUCTION., SET ONE

☒ I, Lakireddy Bali Reddy am an owner of the Defendant and the foregoing answers are based upon my investigation into the facts concerning each specific request.

☒ I am an officer or agent of the party providing this Verification, and am authorized to make this Verification for and on its behalf, and I make this Verification for that reason; I have read the attached document(s) and know the contents; I am informed and believe and upon that ground allege that the matters stated in said document(s) are true.

☐ I am one of the general partners of the partnership providing this Verification, and am authorized to make this Verification for and on behalf of the partnership, and I make this Verification for that reason; I have read the attached document(s) and know the contents; I am informed and believe and upon that ground allege that the matters stated in said document(s) are true.

☐ I am one of the attorneys for the party required to provide this verified Answer; I make this Verification on behalf of said party who is absent from the County of Alameda, California, where I have my office; I have read the attached Answer and know its contents; I am informed and believe and on that ground allege that the matters stated in it are true.

☐ I am one of the attorneys for the party required to provide this verified response. I make this Verification for the reason checked below:

☐ because the facts alleged in the attached document are within my own personal knowledge, and are not within the knowledge of the responding party or any of its agents or employees;

☐ because the responding party's whereabouts are unknown to me, said party has failed to communicate with me concerning the subject litigation, and it is impossible, impractical or futile to secure said party's Verification to the attached document;

The matters stated in the attached document are true of my own knowledge, except as to any matters stated therein upon information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this Verification was executed on _____, 200__ at _____, California.


Jayaprakash Reddy Lakireddy
JAY CONSTRUCTION